

SANTA MONICA MOUNTAINS CONSERVANCY

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June 20, 2005

Daniel Fierros
County of Los Angeles
Department of Regional Planning
320 West Temple Street
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**Comments on Notice of Preparation for The Mission Village Project (part of the
Newhall Ranch Specific Plan), County Project No. 04-181, Vesting Tentative Tract
Map 061105, (SCH# 2005051143)**

Dear Mr. Fierros:

According to the Notice of Preparation (NOP, p. 2) of a Draft Environmental Impact Report (DEIR) for the above-mentioned project, the subject proposed "Mission Village" project is the eastern portion of the Mesas Village as defined in the approved Newhall Ranch Specific Plan. The project acreage is approximately 1,253 acres, 38.1 acres of which are located outside of the Newhall Ranch Specific Plan boundary. The project includes a subdivision for 5,331 residential units, 1,299,000 square feet of non-residential mixed-use space, an elementary school, a private recreation center, landscaped trails and walkways, a bridge over Santa Clara River with abutments and bank stabilization, and a preserve for the San Fernando Valley spineflower.

The County must address why and how additional acreage can be added to the already approved Newhall Ranch project, and whether additional acreage can and will be added in the future. The DEIR must explicitly show on figures the exact location of the additional 38.1 acres being proposed to be added to the Newhall Ranch project. It appears that this area may include the three proposed water tanks, additional grading, a water quality basin, and the extension of Magic Mountain Parkway. The Newhall Ranch Specific Plan now appears to be bleeding into the Stevenson Ranch Phase V project area. Depending on the heights of these tanks, there may be additional viewshed impacts associated with these tanks and grading with respect to parkland and other public areas located to the south.

Evaluating the environmental effects of a large project such as Newhall Ranch comprehensively in a single California Environmental Quality Act (CEQA) document allows reviewers from the public the opportunity to fully understand the real impacts of the project, and whether the mitigation measures adequately offsets those impacts. Splitting

the project, or adding pieces of the project later, result in piece-mealing of the analysis of the environmental impacts. Why were these additional 38.1 acres not considered in the original Newhall Ranch CEQA document? How can the public be assured that additional acres of land will not be added repeatedly to the Newhall Ranch project in the future?

The Santa Monica Mountains Conservancy (Conservancy) has consistently made recommendations on several County projects in the past to the effect that additional adjacent land owned by the same owners of a proposed project should be considered in one CEQA document, so as to avoid this exact problem. Linked ownerships and linked elements of the same project should be considered in the same CEQA document. For example, the Conservancy has repeatedly recommended that any potential development associated with the property owned by Newhall Ranch east of the subject Mission Village project and west of Interstate 5 should have been considered concurrently with the rest of the Newhall Ranch project. It is clearly linked to the Mission Village portion of Newhall Ranch via the extension of Magic Mountain Parkway through this additional property.

The NOP indicates that the three proposed water tanks for reclaimed and potable water storage are proposed outside of the Specific Plan and tract. In any case, the impacts associated with these project elements must be fully included in the DEIR (e.g., included in acres of impacts to vegetation types).

If the County proceeds with adding this additional 38.1 acres to the Newhall Ranch project, the DEIR mitigation measures and the County's conditions of approval must require an open space dedication of at least equal impact to mitigation ratio as the Newhall Ranch Specific Plan. At the least, this should include a ratio of 1 to 1 (one acre of open space dedicated for every acre impacted). The same ownership and management arrangement that is ultimately approved for the high country open space for the Newhall Ranch Specific Plan should be adopted for this additional open space dedication. This would ultimately consist of an additional fee title dedication to the Santa Clarita Watershed Recreation and Conservation Authority (SCWRCA) as a condition of map recordation.

In addition, the DEIR mitigation measures and conditions of approval must require that a conservation easement be granted to SCWRCA any open space along the Santa Clara River. Even if the DEIR may propose that these areas be owned by the homeowners' association, this additional conservation easement is necessary to guarantee the long-term protection of this highly ecologically valuable area. It is important to include in this conservation easement the part of the open space surrounding the Commerce Center Drive bridge abutments proposed in the Santa Clara River.

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The DEIR must explicitly explain, without a doubt, what elements of the project have been approved under the Specific Plan, and what portions of the project are being considered under the current DEIR. Specifically the current DEIR must identify the level of detail of project elements and mitigation measures that have been approved under the Specific Plan CEQA document. It may be necessary to require additional specificity for mitigation measures in the current document. For example, it may be prudent to include additional specificity regarding required mitigation measures for removal of 219 of the 722 oak trees onsite, and 12 off-site trees (associated with the westerly extension of Magic Mountain Parkway).

During the course of the Newhall Ranch Specific Plan project, there has been much difference of opinion amongst experts about the amount of flood terrace and upland buffer necessary to maintain near-full ecological capacity of the Santa Clara River. The DEIR must include at least one economically feasible alternative that provides a minimum of 500-foot-wide buffer between any and all proposed bank stabilization and the proposed edge of any improvements (except bridge abutments) including hardscaping, non-native landscaping, fencing, and structures. Furthermore, we do not believe that the Specific Plan covered the large proposed debris basin located directly next to the active channel of the Santa Clara River. The DEIR should include an alternative that pulls back this basin at least 500 feet from the proposed bank stabilization.

The Conservancy, County, project applicant, and the public are keenly aware of the extreme environmental sensitivity of the subject area, and the issues identified in this letter must be addressed in the DEIR. Thank you for your consideration of these comments. Please direct any questions and all future correspondence to Judi Tamasi of our staff at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,

ELIZABETH A. CHEADLE
Chairperson

cc: State Clearinghouse